



David G Yetter
President
Environment Health &
Safety Division

Texaco Inc

2000 Westchester Avenue
White Plains NY 10650
914 253 7058
FAX 914 253 4495

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December 7, 1998

Ms. Carol Browner, Administrator
US EPA
PO Box 1473
Merrifield, VA 22116
Attn: Chemical Right-to-Know Program

Dear Ms. Browner:

Thank you for your October 9, 1998 letters to Mr. Peter I. Bijur, Chairman of the Board and CEO of Texaco Inc., and Mr. Clarence P. Cazalot, formerly President of Texaco Exploration and Production Inc., announcing the EPA High Production Volume (HPV) Challenge Program. As you may know, Texaco Inc. has restructured its U.S.-based business interests over the past five years. We are no longer a chemical manufacturer and our U.S. refinery and marketing interests are held through two affiliates, Equilon L.L.P. and Motiva L.L.P., who will separately respond to your letters. Texaco's commitment to providing our customers and workers with health and safety information about our products remains strong. We have developed health, safety, and environmental information about our products through an in-house toxicity evaluation program as well as participation in testing consortia through trade associations such as the Chemical Manufacturer's Association, the American Petroleum Institute, the Petroleum Product Stewardship Council, and CONCAWE.

Because of the similarities among the HPV substances that the petroleum industry manufactures, the industry has been working with its trade associations to develop a coordinated testing plan to meet the intended needs of the program. Member companies from the American Petroleum Institute (API), National Petrochemical and Refiners Association (NPRA), Gas Processors Association (GPA), and Asphalt Institute (AI) are engaged in a process to form a consortium to address these needs. Texaco Inc. intends to participate in the HPV Challenge Program through this petroleum industry consortium.

API is coordinating the petroleum industry effort to evaluate the existing data on the HPV petroleum substances and develop a testing program to fill gaps. Upon completion of this effort in early 1999, the petroleum industry consortium will provide a follow-up letter to EPA that will include a list of the industry sponsored substances along with a schedule for testing. The information and data provided through the consortium will be made available to the public. If you have questions about any aspect of this program please contact Dr. Carol Henry of API at 202-682-8341, or Dr. Jane Vergnes of my staff at 914-838-7356.

Sincerely,

DGY:pjc:7/1 (12/98)

cc: Dr. Carol J. Henry, API
Dr. Jan Vergnes, Texaco Inc.

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